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11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF WASHINGTON

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 vs.

16 [REDACTED], and
17 KENNETH L. STONE,

18 Defendants.

19 INDICTMENT

20 21 U.S.C § 841(a)(1), (b)(1)(A)(viii)
21 Possession with Intent to Distribute
22 Methamphetamine
23 (Count 1)

24 18 U.S.C. § 924(c)(1)(A)
25 Possession of a Firearm in
26 Furtherance of a Drug Trafficking
27 Crime (Count 2)

28 Forfeiture Allegations

The Grand Jury charges:

COUNT ONE

That on or about August 21, 2015, in the Eastern District of Washington, the Defendants, [REDACTED] and KENNETH L. STONE, did knowingly and intentionally possess with intent to distribute 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(viii).

COUNT TWO

That on or about August 21, 2015, in the Eastern District of Washington, the Defendant, [REDACTED] and KENNETH L. STONE, did knowingly possess firearms, that is a Glock 9mm, Model 17, pistol bearing serial number RMF685 and an Iver Johnson .410 caliber Shotgun bearing serial number 842407A, in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, that is, Possession with Intent to Distribute 50 Grams or More of Pure (Actual) Methamphetamine, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(viii), as charged in Count 1, all in violation of 18 U.S.C. § 924(c)(1)(A)(i).

NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

1. The allegations contained in Counts 1 - 2 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. § 853, and/or 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c).

2. Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21 U.S.C. § 841(a)(1), as set forth in Count 1 of this Indictment, [REDACTED] and KENNETH L. STONE shall forfeit to the United States of America, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense(s) and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of the offense(s). The property to be forfeited includes, but is not limited to:

FIREARMS:

- a. a Glock 9mm pistol bearing serial number RMF685; and,
- b. an Iver Johnson Shotgun bearing serial number 842407A

3. If any of the property described above, as a result of any act or omission of the Defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- 1 c. has been placed beyond the jurisdiction of the court;
2 d. has been substantially diminished in value; or
3 e. has been commingled with other property which cannot be divided
4 without difficulty, the United States of America shall be entitled to
5 forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), and 28
6 U.S.C. § 2461(c).

7 4. Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon
8 conviction of an offense in violation of 18 U.S.C. §§ 922(c)(1)(A), as set forth in
9 Count 2 of this Indictment, CHERYL L. SUTTON and KENNETH L. STONE shall
10 forfeit to the United States of America, any firearms and ammunition involved or used
11 in the commission of the offense, including, but not limited to the following:

12 FIREARMS:

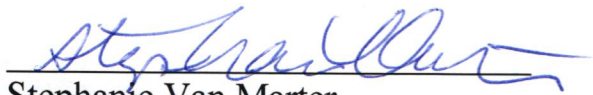
- 13 c. a Glock 9mm pistol bearing serial number RMF685; and
14 d. an Iver Johnson Shotgun bearing serial number 842407A


15 DATED: August _____, 2016

16 A TRUE BILL

17 
18 _____
19 Foreperson

20 
21 MICHAEL C. ORMSBY
22 United States Attorney

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